

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 05-10113-DPW
)	
REYLANDO REYES)	

DEFENDANT'S MOTION IN LIMINE
TO EXCLUDE POLICE OFFICERS' TESTIMONY
REGARDING PRIOR KNOWLEDGE OF DEFENDANT

Defendant, pursuant to Fed.R.Evid. 404(b), 402, and 403, hereby moves that the Court limit the Boston police officers' testimony regarding their prior knowledge of, and prior encounters with, defendant.

Testimony at the hearing on the Motion to Suppress in this case showed that Police Officers Cogavin and Laham knew the defendant from prior encounters on the street, and knew that he had prior convictions. The Officers also testified that they kept a photograph of Mr. Reyes in a book of "players" that they carried with them in their patrol car. The Officers further testified that they had completed Field, Interrogation, and Observation Reports concerning Mr. Reyes and their prior dealings with him.

The foregoing evidence is patently inadmissible under Fed.R.Evid. 402 in that such testimony is completely and utterly irrelevant to whether Mr. Reyes possessed a bullet on the date of February 27, 2005. Moreover, the evidence is inadmissible under Fed.R.Evid. 404(b) and, moreover, is more prejudicial than

probative. Fed.R.Evid. 403. Defendant therefore moves that such statements, and any similar such statements by the officers, be excluded.

REYLANDO REYES
By his attorney,

/s/ Stylianus Sinnis
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Certificate of Service

I, Stylianus Sinnis, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on July 18, 2006.

/s/Stylianus Sinnis
Stylianus Sinnis